

REMARKS

This Application has been carefully reviewed in light of the Final Office Action dated August 15, 2007 ("*Office Action*"). At the time of the *Office Action*, Claims 1-87 and 89 were pending in the Application. In the *Office Action*, the Examiner rejects Claims 1-87 and 89. Applicants amend Claims 1, 23, 45, and 67. Applicants add new Claim 90. As described below, Applicants believe all claims to be allowable over the cited references. Therefore, Applicants respectfully request reconsideration and full allowance of all pending claims.

I. Section 102 Rejections

The Examiner rejects 1-13, 22-35, 44-57, 66-79, and 89 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,933,647 issued to Aronberg et al. ("*Aronberg*"). For the reasons discussed below, Applicants respectfully request reconsideration and allowance of Claims 1-13, 22-35, 44-57, 66-79, and 89.

A. Claims 1-13, 23-35, 45-57, and 67-79

Independent Claim 1 of the present Application, as amended, recites:

A method for managing a plurality of computers, at least one of the plurality of computers associated with a user having a user characteristic, comprising:

displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users;

receiving selection information from the network administrator, the selection information comprising a user characteristic associated with the selected user;

receiving management information from the network administrator;

selecting at least one of the plurality of computers based on the selection information; and

modifying the at least one selected computer based on the management information.

Applicants respectfully submit that *Aronberg* does not disclose, teach, or suggest this combination of features and operations.

For example, *Aronberg* does not disclose, teach, or suggest “displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users,” as recited in Claim 1. Although *Aronberg* relates to the “a system for distributing software in a customized configuration, to pre-selected computers in a network environment” and includes a workstation running a console for “[creating] distribution control information which dictates how the software is distributed and to what agent based workstations under a given set of conditions” (Abstract), the workstation running a console disclosed in *Aronberg* does not include the above-identified features recited in Applicants’ Claim 1

In fact, *Aronberg* specifically discloses that “a condition expression builder . . . controls which computer should install the software” and that such conditions “may be based on the name **of the computer** running the agent, a group membership **of the computer** running the agent, or hard disk capacity **of the computer** running the agent.” (Column 3, lines 8-14). Thus, the condition expression builder of *Aronberg* is client based rather than user based.

Specifically, *Aronberg* discloses that the “administrator schedules a distribution of the application, i.e., profile, using the scheduler, and specifies which agent based workstations 103 or 104 should receive the application using a condition builder.” (Column 4, lines 50-54). Figures 3-10 illustrate the dialog boxes that are displayed to the administrative user. Figure 6 appears to be the only figure that allows an administrative user to perform any user-related operations. However, that figure merely illustrates a dialog box that allows an administrative user to designate various users to a group of users. (Column 5, lines 49-65). Boxed area 603 lists all groups of agents for the administrator. (Column 5, lines 53-54). Boxed area 602 lists all agents within a particular

group. (Column 5, lines 53-54). Neither boxed areas 602 or 603 includes “resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users,” as recited in Claim 1. Accordingly, Applicant respectfully submits that *Aronberg* does not disclose, teach, or suggest “displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users,” as recited in Claim 1.

For at least these reasons, Applicants respectfully request reconsideration and allowance of independent Claim 1, together with Claims 2-13 that depend on Claim 1.

The Examiner also relies on *Aronberg* to reject independent Claims 23, 45, and 67, which recite certain features and operations that are analogous to those discussed above with regard to Claim 1. For example, Claim 23 recites “code for displaying, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users.” As another example, Claim 45 recites “[a] programmed computer system for managing a plurality of computers . . . comprising instructions for causing a computer to . . . display, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users.” Claim 67 recites a “managing computer comprising a central processing unit operable to . . . display, to a network administrator, a user-object data structure comprising resource information identifying all network computers within a plurality of network computers that are used by a selected one of a plurality of users.” Accordingly, for reasons similar to those discussed above with regard to Claim 1, Applicants respectfully submit that *Aronberg* does not disclose, teach, or suggest the features recited in Applicants’ Claims 23, 45, and 67.

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claims 23, 45, and 67 together with Claims 24-35, 46-57, and 68-79 that depend on Claims 23, 45, and 67, respectively.

B. Claims 22, 44, 66, and 89

Independent Claim 22 of the present Application, as amended, recites the following combination of elements:

- receiving selection information including one of the user characteristic and a computer characteristic from one of the plurality of computers;
- transmitting the selection information to a managing computer; [and]
- modifying the computer from which the selection information was received based on the policy applicable to the user.

Applicants respectfully submit that *Aronberg* does not disclose, teach, or suggest this combination of features and operations.

As stated above, *Aronberg* relates to the “a system for distributing software in a customized configuration, to pre-selected computers in a network environment” and includes a workstation running a console for “[creating] distribution control information which dictates how the software is distributed and to what agent based workstations under a given set of conditions.” (Abstract). Specifically, *Aronberg* discloses that the “**administrator** schedules a distribution of the application, i.e., profile, using the scheduler, and specifies which agent based workstations 103 or 104 should receive the application using a condition builder.” (Column 4, lines 50-54). Thus, to the extent that *Aronberg* discloses “receiving selection information,” such information is received from an administrator using a console for controlling the distribution of control information.

Aronberg further discloses that the “distribution control information created by the console means includes a profile which instructs the computer running the agent on how to

install the software onto itself.” (Column 2, line 66 through Column 3, line 1). According to *Aronberg*, “[e]ach agent 103, 104 detects a newly scheduled application, and evaluates the condition for distribution to see if the distribution to it is appropriate.” (Column 4, lines 54-56). Thus, to the extent that *Aronberg* discloses “transmitting the selection information,” such transmission is from the administrator’s computer to the end user’s computer. The transmission is not “to the managing computer,” as recited in Claim 22.

Finally, *Aronberg* further discloses that “[i]f the distribution is appropriate for a particular agent, that agent pulls down the distribution, i.e., the agent performs the actual distribution.” (Column 4, lines 56-59). As such, *Aronberg* specifically discloses that an administrator selects the distributions to be applied to a computer and an agent (i.e., program) on the end user’s computer determines if it should download the distribution. Because *Aronberg* specifically discloses that the administrator performs the initial selection of a distribution but that the end user’s computer downloads the distribution to itself, Applicants respectfully submit that *Aronberg* does not disclose, teach, or suggest “modifying the computer from which the selection information was received based on the policy applicable to the user,” as recited in Claim 22. In fact, to the extent that a computer is modified using the *Aronberg* system, the modified computer is not “**the computer from which the selection information was received,**” as recited in Claim 22.

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claim 22.

The Examiner also relies on *Aronberg* to reject independent Claims 44, 66, and 89, which recite certain features and operations that are analogous to those discussed above with regard to Claim 22. For example, Claim 44 recites “code for receiving selection information including one of the user characteristic and a computer characteristic from one of the plurality of computers,” “code for transmitting the selection information to a managing computer,” and “code for modifying the computer from which the selection information was received based on the policy applicable to the user.” As another example,

Claim 66 recites instructions for causing a computer to “receive selection information including one of the user characteristic and a computer characteristic from one of the plurality of computers,” “transmit the selection information to a managing computer,” and “modify the computer from which the selection information was received based on the policy applicable to the user.” As another example, Claim 89 recites “a managing computer . . . operable to . . . receive the selection information transmitted by the network computer” and “modify the computer from which the selection information was received based on the policy applicable to the particular user.” Accordingly, for reasons similar to those discussed above with regard to Claim 22, Applicants respectfully submit that *Aronberg* does not disclose, teach, or suggest the features recited in Applicants’ Claims 44, 66, and 89.

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claims 44, 66, and 89.

II. Section 103 Rejections

The Examiner rejects Claims 14-21, 36-43, 58-65, and 80-87 under 35 U.S.C. § 103(a) as being unpatentable over various combinations of *Aronberg* with U.S. Patent No. 5,742,829 issued to Davis et al. (“*Davis*”), “SMS 2 Administration,” SAMS, February 2000, by Lubanski (“*Lubanski*”), and “Windows 2000 Active Directory,” SAMS, February 2000, by Brovick, Hauger, and Wade (“*Brovick*”).

Dependent Claims 14-21, 36-43, 58-65, and 80-87 depend upon independent Claims 1, 23, 45, and 69, respectively, which Applicants have shown above to be allowable. Accordingly, dependent Claims 14-21, 36-43, 58-65, and 80-87 are not obvious over the various combinations of references relied upon by the Examiner at least because Claims 14-21, 36-43, 58-65, and 80-87 include the limitations of their respective independent claims. Since Claims 14-21, 36-43, 58-65, and 80-87 incorporate the limitations of their respective independent claims, Applicants have not provided detailed arguments with respect to Claims 14-21, 36-43, 58-65, and 80-87. However, Applicants

remain ready to do so if it becomes appropriate. Applicants respectfully request reconsideration and allowance of Claims 14-21, 36-43, 58-65, and 80-87

For at least these reasons, Applicants respectfully request reconsideration and allowance of Claims 14-21, 36-43, 58-65, and 80-87.

III. New Claim 90 is Allowable

New Claim 90 has been added and is fully supported by the original specification. No new matter has been added. New independent Claim 90 of the present Application recites:

A method for managing a plurality of computers associated with a user having a user characteristic, comprising:
displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user;
receiving selection information from the network administrator, the selection information comprising a user characteristic associated with the user;
receiving management information from the network administrator;
based on the selection information, selecting the plurality of network computers that are associated with the user; and
modifying the selected plurality of network computers based on the management information.

Applicants respectfully submit that *Aronberg*, whether considered alone or in combination with any other cited reference, does not disclose, teach, or suggest this combination of features and operations.

For example, *Aronberg* does not disclose, teach, or suggest “displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user,” as recited in Claim 90. As stated above with respect to Claim 1, Figure 6 of *Aronberg* appears to be the only figure that allows an administrative user to perform any end user-related operations. However, that figure merely illustrates a

dialog box that allows an administrative user to designate various users to a group of users. (Column 5, lines 49-65). Specifically, boxed area 603 lists all groups of agents for the administrator. (Column 5, lines 53-54). Boxed area 602 lists all agents within a particular group. (Column 5, lines 53-54). Neither boxed areas 602 or 603 includes “resource information identifying a plurality of network computers that are used by a single user,” as recited in Claim 1. Accordingly, Applicant respectfully submits that *Aronberg* does not disclose, teach, or suggest “displaying, to a network administrator resource information identifying a plurality of network computers that are used by a single user,” as recited in Claim 90. For analogous reasons, Applicants also submit that *Aronberg* does not disclose, teach, or suggest “modifying the selected plurality of network computers based on the management information,” as recited in Claim 90. Furthermore, the additional disclosures of *Davis*, *Lubanski*, and *Brovick* do not cure these identified deficiencies of *Aronberg*.

For at least these reasons, Applicants respectfully request consideration and allowance of independent Claim 90.

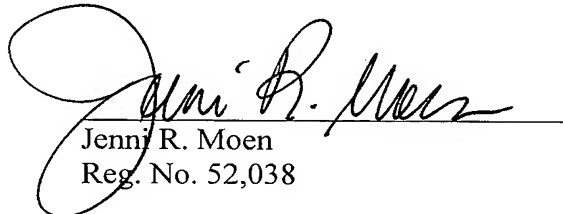
CONCLUSION

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Jenni R. Moen, Attorney for Applicants, at the Examiner's convenience at (214) 953-6809.

The Commissioner is authorized to charge \$250.00 to Deposit Account No. 02-0384 of Baker Botts L.L.P. for an additional independent claim. Applicants believe that no other fees are due; however, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorneys for Applicants



Jenni R. Moen
Reg. No. 52,038

Date: September 21, 2007

Correspondence Address:

at Customer No. **05073**